



# Privacy Policy

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## 1. Introduction

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SCA Property Group (**Group**) comprises Shopping Centres Australasia Property Management Trust ARSN 160 612 626, Shopping Centres Australasia Property Retail Trust ARSN 160 612 788 (together, **Trusts**), Shopping Centres Australasia Property Group RE Limited ABN 47 158 809 851 (**Responsible Entity**) and any entities owned and / or managed, either beneficially or legally, by the Trusts or the Responsible Entity, together with any managed investment schemes to which management services are provided by any entity owned by the Group.

## 2. Objective

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This policy sets out the approach of the Group in complying with its legal requirements in respect of the collection, maintenance, storage and use of your personal information<sup>1</sup> (including sensitive information<sup>2</sup>), including requirements under the *Privacy Act 1988* (Cth) as amended (including the Australian Privacy Principles) (**Privacy Act**).

This policy may be updated from time to time, and so we encourage you to regularly check our website.

The Group has appointed a Privacy Officer. This person is responsible for implementing the privacy policy and the person to whom any queries or complaints should be referred.

## 3. What sort of personal information does the Group collect and hold and who does it collect from?

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The Group, and third parties on its behalf, collect personal information in order to enable the Group to carry on its business. Examples of the types of personal information that may be collected by, or on behalf of, the Group and from whom the personal information is collected from are as follows:

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<sup>1</sup> Personal information is defined under the Privacy Act as information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or note, and whether the information or opinion is recorded in a material form or not.

<sup>2</sup> Sensitive information is defined under the Privacy Act as any personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates.

<b>Who the Group collects information from</b>	<b>Entity that collects information on behalf of the Group</b>	<b>Examples of information that may be collected</b>
<p><b>Tenants:</b> Prospective tenants and tenants at its shopping centres and guarantors and officers of those tenants</p>	<p>Property Managers e.g. Knight Frank, Colliers, Comac, Race</p>	<p>Name, contact details (e.g. email and home address and phone numbers), and financial and payment history information.</p>
<p><b>Investors:</b> Unitholders in its managed investment schemes</p>	<p>Link, Boardroom and the Group</p>	<p>Name, email and home address, tax file number (TFN), bank account details and, where relevant, details of any complaint.</p>
<p><b>Workers:</b> Prospective employees and contractors and other people who work for the Group, but are not employees</p>	<p>The Group and recruiters engaged by the Group</p>	<p>Name, email and home address, next-of-kin, TFN, bank account details, background checks and superannuation fund details.</p>
<p><b>Visitors</b></p>	<p>Third party service providers e.g. Wi-Fi technology service providers or car parking managers at our shopping centre sites</p>	<p>Where you interact with technologies operated by our third party providers (e.g. Wi-Fi / beacon / advertising technology, number plate recognition technology), our third party providers may collect and disclose to us data such as name, email, address, type of device, MAC address and log-in/log-off times.</p>

From time to time, the Group may also collect personal information about tenants, investors, workers or visitors from third parties in the course of the Group's functions and activities.

The Group only collects personal information that is relevant and appropriate for the operation of the Group's business.

The Group only collects individuals' sensitive information in limited circumstances. For example, the Group may collect sensitive information from a prospective tenant so that the Group can make an assessment of the suitability of that prospective tenant. The Group will obtain the individual's consent prior to collecting their sensitive information.

#### 4. Why does the Group collect the information and what if I don't provide it?

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##### ***Prospective Tenants and Tenants***

The primary purpose of collection of personal information from ***prospective tenants*** is to consider your suitability as a tenant and, once accepted, to prepare the necessary documentation for you to become a tenant. If you do not provide the required information, the Group will not be able to assess your suitability as a tenant at one of our shopping centres.

The primary purpose of collection of personal information from ***tenants*** is to administer your lease with the Group. The information may be used within the Group, for example, for the purposes of collecting rent, monitoring receivables, our financial reporting and valuation of our properties. If you do not provide this information, we will not be able to properly administer your lease, for example, by acknowledging that your rent has been paid.

Where the Group collects information from tenants and prospective tenants the information may be used for:

- the purposes of particular transactions involving the tenant or prospective tenant;
- monitoring a tenant's compliance with their lease and performance within the relevant shopping centre; or
- identifying other potential leasing or general commercial opportunities the Group considers may be of interest to that tenant or prospective tenant.

##### ***Investors***

The primary purpose of collection of personal information from ***investors*** is to comply with laws (particularly the *Corporations Act 2001* (Cth)) and to assist

investors in meeting their taxation requirements. We also collect personal information for the purpose of making distributions in the most cost effective way and to assist the Group to communicate with investors (including direct marketing communications as set out below) or deal with any concerns they may have. If you do not provide the requested information, the Group will not be able to inform you of important information concerning your investment or pay you the distribution you are entitled to. We may also need to deduct from your distribution more tax than we otherwise would if you had registered your TFN with Link.

By collecting this information, the Group is complying with its obligations under its Constitutions, ASIC's regulatory guides and various laws, and our internal compliance reporting requirements.

### **Workers**

The primary purpose of collection of personal information from **potential employees and contractors** is to assess the suitability of applicants for the role offered and, in the case of contractors who are individuals, establishing records and systems to enable the Group to pay you and review your performance. If you do not provide the requested information, the Group will not be able to assess your suitability for any offered role within the Group. For contractors who are individuals, if you do not provide the requested information, the Group may not be able to pay you, or may have to deduct greater amounts than would otherwise be necessary for tax purposes.

If an individual's employment application is unsuccessful, the Group may retain the information about that individual in case a more appropriate opportunity becomes available. Applicants may request that the Group not retain this information.

### **Visitors**

In circumstances where we collect personal information from **visitors**, including through our third party providers, the primary purpose of our collection of that information is in connection with the management and security of the Group's shopping centre sites, to measure customer demographics and behaviours, to improve our shopping centres, to allow us to inform you of events, activities and promotions and otherwise in connection with our business. Generally speaking, you are not obligated to provide us with personal information. If you do not provide a third party provider with your personal information that third party may not be able to provide you with relevant products and/or services.

### **Generally**

The Group may be required to hold this information for at least 7 years. Where the Group is no longer required to keep the personal information or no longer needs it, it will take reasonable steps to destroy the personal information or de-identify it.

## 5. How information is collected

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The Group will collect personal information directly from the individual concerned, unless it is unreasonable or impractical to do so.

The Group may also collect information in particular circumstances from an individual's agent or from governmental sources. In those circumstances, if necessary, the Group will take reasonable steps to inform the individual that the collection has occurred and will provide any other relevant information about that collection required by the Privacy Act.

Personal information is generally collected:

- in respect of **tenants**: directly from the tenant or prospective tenant through a tenant application, an "intention to lease" (**ITL**) document or similar, or from our contracted service providers during the course of the tenancy. Occasionally, we may collect information from a third party, such as in circumstances where a third party makes a complaint about a tenant;
- in respect of **investors**: directly from the investor by the relevant investor updating their information on-line, or as a result of the investor making a complaint to the Group. We also collect personal information from Link where an investor updates their information by sending a hardcopy form to Link or over the phone with Link;
- in respect of **workers**: directly from the prospective employee or individual contractor, including where individuals submit applications or register interest for employment with the Group, or, where the employee comes through a recruiter, from the recruiter. The Group may also collect information from referees in relation to prospective employees.
- in respect of **visitors**: through our third party service providers, including where individuals interact with certain technologies at our shopping centre sites.

## 6. Unsolicited information

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Where the Group receives unsolicited information, for example from an individual who wishes to become an employee, tenant or investor, the Group will treat the information as if it had collected it directly from the individual.

If the Group receives information it could not lawfully collect itself, it will destroy that information or ensure that it is de-identified where lawful and reasonable to do so.

## 7. Direct Marketing Communications

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### ***Investors***

The Group may send its investors direct marketing communications and information about products and services that it considers may be of interest to its investors. This may include information about products and services that are provided by other related parties and entities within the Group.

These communications may be sent in various forms, including by telephone, post, fax, email, SMS or by other forms of electronic messages.

Each investor of the Group consents to being sent these direct marketing communications by any of those methods. If an investor indicates a preference for a method of communication, the Group will try to use that method whenever practical to do so.

An investor may opt-out of receiving marketing communications from the Group at any time by using any of the opt-out facilities provided in the marketing communications or as set out below.

### ***Tenants***

The Group may send its tenants direct marketing communications and information about products and services that it considers may be of interest to its investors.

The Group may also from time to time send its tenants general marketing material.

A tenant may opt-out of receiving marketing communications from the Group at any time by using any of the opt-out facilities provided in the marketing communications or as set out below.

### ***Visitors***

The Group may send its visitors direct marketing communications and information about products and services that it considers may be of interest. The Group may also from time to time send its visitors general marketing material.

A visitor may opt-out of receiving marketing communications from the Group at any time by using any of the opt-out facilities provided in the marketing communications or as set out below.

## 8. Opting Out

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Investors, tenants and visitors can opt out from receiving direct marketing communications. In order to opt-out, please contact the Privacy Officer by emailing [privacy.officer@scaproperty.com.au](mailto:privacy.officer@scaproperty.com.au).



For investors, even if you opt-out of receiving direct marketing communications, the Group will still send you essential information about your account, your investment in the Group and other information required by law.

## **9. To whom is my personal information disclosed?**

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The Group does not provide your personal information to third parties, except as stated below. The Group has taken steps to ensure that these third parties comply with the Privacy Act 1988 and this privacy policy. Personal information may also be disclosed to other members of the Group.

From time to time, the Group may undertake a marketing campaign in one of its Shopping Centres and may provide information about tenants in the Shopping Centre to an entity assisting it with that campaign to the extent such information is relevant to the campaign.

Parties to whom the Group may disclose relevant personal information include:

- our employees and related bodies corporate;
- third party suppliers and service providers;
- specific third parties authorised by you to receive information held by us;
- consultants and advisers (including, but not limited to, solicitors) and agents (including, but not limited to, real estate agents and debt collection services and, for workers, travel agents) or contractors acting on the Group's behalf;
- valuers, where the Group is seeking to revalue a property or lease, and to its financiers;
- the Australian Securities Exchange, the Land and Property Information Services in each state and territory of Australia, the Australian Securities and Investment Commission and other regulatory authorities where required by law;
- parties to whom the Group has outsourced various functions related to the operation of the Group's business e.g. IT services, registry services, property management services or facilities management services; and other third parties that the Group reasonably considers may provide relevant products or services of interest to tenants or investors.

## **10. Does my personal information leave Australia?**

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The Group will only send your personal information outside Australia:

- if we are authorised to do so by law;

- for any of the purposes set out in this policy (but only to parties that are subject to obligations in relation to personal information no less onerous than those in this policy); or
- if you have consented to us doing so.

## **11. Maintenance of the quality of information**

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The Group takes reasonable steps to ensure that the personal information it collects and uses is accurate, complete and up to date. Wherever possible, it will ask the individual who provided the information previously to confirm it is up to date.

The Group may from time to time to delete or de-identify information about you when it is no longer needed or there is no longer a legal requirement for the information to be kept.

## **12. Access to and correction of personal information held by the Group**

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If an individual wishes to access personal information that the Group holds about them or to correct any errors or omissions in that information, they should contact the Privacy Officer. You will need to specify the personal information to which you are seeking access. If a third party holds the information for the Group, you will need to contact that third party directly and comply with their procedures.

To ensure the integrity and safety of the personal information, the Group will only disclose personal information to an individual if its internal procedures are satisfied. Depending on the nature of the request, the Group may ask you to put your request in writing, provide photo identification and sign an enquiry form, which will be sent to you.

To contact the Privacy Officer you should either:

Email: [privacy.officer@scaproperty.com.au](mailto:privacy.officer@scaproperty.com.au)

Write to: **Privacy Officer**  
Level 5, 50 Pitt Street  
SYDNEY NSW 2000

## **13. Complaints regarding your personal information**

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You can make a complaint about the way in which the Group has handled your personal information by writing to the Group's Privacy Officer. The Group's Privacy Officer will endeavour to act promptly to investigate the complaint and determine

whether a breach of this policy or the Privacy Act has occurred and what action, if any, to take.

The Group's Privacy Officer will take any privacy complaint seriously and will aim to resolve any such complaint in a timely and efficient manner.

If you have any questions or concerns about the Group's collection, use or disclosure of personal information, or if you believe the Group has not complied with this policy or the Privacy Act, you may also contact the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia) as follows:

Email: [www.oaic.gov.au](http://www.oaic.gov.au)

Write to: **Director of Compliance**  
Office of the Australian Information Commissioner  
GPO Box 5218  
SYDNEY NSW 2001

Phone: **1300 363 992**

Complaints must be made in writing.

#### **14. Complaints and access to personal information held by third parties on behalf of the Group**

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##### ***Investors in the Group***

The Group has outsourced its registry function to Link Market Services Limited (**Link**). Link has developed a privacy policy dealing with the information it collects on the Group's behalf. To obtain a copy of Link's privacy policy

Email: [privacy.officer@linkgroup.com](mailto:privacy.officer@linkgroup.com)

Write to: **Privacy Officer**  
Link Market Services Limited  
Locked Bag A14  
SYDNEY SOUTH NSW 1235

You should contact the Link Privacy Officer if you as an investor:

- have a complaint about privacy; or
- would like details of your personal information held by Link on behalf of the Group; or
- would like to correct your personal information held by Link on behalf of the Group.

For your protection, Link may only disclose personal information if its internal procedures are satisfied. If you are not satisfied by Link's response to your privacy concerns you should contact the Group's Privacy Officer.

If your holding is sponsored by a broker, you will need to contact your broker to update your personal information.

***Investors in funds managed by SURF RE***

SURF RE has outsourced its registry function to Boardroom Registry Services (**Boardroom**) Boardroom has developed a privacy policy dealing with the information it collects on SURF RE's behalf. To obtain a copy of Boardroom's privacy policy contact:

Email: [privacyofficer@boardroomlimited.com.au](mailto:privacyofficer@boardroomlimited.com.au)

Write to: **Privacy Officer**  
Boardroom Pty Limited  
GPO Box 3993  
SYDNEY NSW 2001

You should contact the Boardroom Privacy Officer if you as an investor:

- have a complaint about privacy; or
- would like details of your personal information held by Boardroom on behalf of SURF RE; or
- would like to correct your personal information held by Boardroom on behalf of SURF RE.

For your protection, Boardroom may only disclose personal information if its internal procedures are satisfied. If you are not satisfied by Boardroom's response to your privacy concerns you should contact the Group's Privacy Officer.

***Prospective Tenants and Tenants***

The Group has outsourced aspects of its property management to the following organisations (**Property Managers**):

- Knight Frank (**KF**) - Western Australia, regional New South Wales and North Queensland
- CBRE (**CBRE**) – South Queensland
- Comac Property Group (**Comac**) - Eastern Victoria
- Knight Frank Tasmania (**KFT**) – Tasmania
- Colliers (**Colliers**) - Coastal NSW, Western/ Northern Victoria, South Australia

You should contact the Privacy Officer of the relevant Property Manager if you are a prospective tenant or a tenant and:

- have a complaint about privacy; or
- would like details of your personal information, which that Property Manager holds on behalf of the Group; or
- would like to correct your personal information held by the relevant Property Manager on behalf of the Group.

For your protection, the Property Manager may only disclose personal information if their internal procedures are satisfied. If you are not satisfied by the relevant Property Manager's response to your privacy concerns you should contact the Group's Privacy Officer.

## **15. Storage and security of information**

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The Group takes all reasonable steps to protect your personal information from loss, unauthorised access, destruction, misuse, modification, interception or disclosure. The Group may store your files with a third party data storage provider.

The Group maintains physical security measures over its physical premises, and a range of computer and network security measures (such as systems access, firewalls, data encryption) over its electronic systems to protect the information that the Group holds. The Group's employees are also required to maintain the confidentiality of any personal information held. If other parties provide support services, the Group generally requires them to agree to appropriately protect the privacy of the information provided to them.

The Group does not sell personal information to third parties.

## **16. Notifiable Data Breaches scheme**

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In the event of any loss or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, the Group will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act.

## **17. Visiting our website**

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When you visit the Group's website under the domain name [www.scaproperty.com.au](http://www.scaproperty.com.au), the Group collects certain anonymous information arising out of your visit. That information includes the date and time of your visit, how long you spent on the Group's website and the pages that were viewed during

the course of your visit. It also includes some technical details about the computer and web browser being used to visit the Group's website (specifically, the user-agent and IP address sent by your web browser).

None of this information allows the Group to personally identify you or your email address. The Group uses this information in an aggregated form to help us understand patterns of use of this website, to measure the effectiveness of this website and produce statistical usage reports. The Group's website currently uses (first party) "cookies". Cookies are a type of file that websites may transfer to your hard drive to allow the website to identify your computer in the future. Cookies do not enable you to be identified as an individual. These cookies are used to maintain the session between your web browser and the server during your visit.

The Group's website does not ask you for, or capture, any of your personal information.